

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF SAM W. KLEIN,

SAM W. KLEIN EIGHTH RESTATED
REVOCABLE TRUST AGREEMENT DATED
JUNE 5, 2007,

BANK OF AMERICA, N.A., in its capacity as
Personal Representative and as Trustee,

MICHAEL S. KLEIN, in his capacity as Personal
Representative and as Trustee,

PETER A. GROSSMAN, in his capacity as
Trustee,

ADAM PISANO, in his capacity as Trustee,

MARITAL TRUST FOR THE BENEFIT OF
JAYNE KLEIN,

Adv. Pro. No. 10-05223 (SMB)

TRUST FOR THE BENEFIT OF WARREN
KLEIN,

TRUST FOR THE BENEFIT OF LILLIAN
KLEIN,

TRUST FOR THE BENEFIT OF N.K., and

TRUST FOR THE BENEFIT OF KANDICE
KLEIN,

Defendants.

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including March 25, 2015.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the

same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

[THIS PORTION IS INTENTIONALLY LEFT BLANK]

Dated: February 12, 2015
New York, New York

By: /s/ Marc E. Hirschfield
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Marc E. Hirschfield
Email: mhirschfield@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

Dated: February 12, 2015
New York, NY

By: /s/ Michael I. Goldberg
AKERMAN LLP
Las Olas Centre II, Suite 1600
350 East Las Olas Boulevard
Fort Lauderdale, FL 33301-2229
Telephone: 954-463-2700
Facsimile: 954-463-2224
Michael I. Goldberg, Esq.
Email: michael.goldberg@akerman.com

Attorneys for Defendants

/s/ Deborah A. Reperowitz
Deborah A. Reperowitz, Mediator
TROUTMAN SANDERS LLP
The Chrysler Building
405 Lexington Avenue
New York, NY 10174
Telephone: 212-704-6230
Facsimile: 212-704-6288
Email: deborah.reperowitz@troutmansanders.com